

EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUSAN COONEY,

Plaintiff,

vs.

Docket No. 0411572 JLT

SAYBROOK GRADUATE SCHOOL and
RESEARCH CENTER, and MAUREEN
O'HARA, Individually,

Defendants.

COPY

Deposition of
RUTH RICHARDS, M.D., Ph.D.

MARCH 15, 2006

NOTICING ATTORNEY, PAUL W. MORENBERG, ESQ.

REPORTED BY: JEANINE FARRELL, CSR NO. 7774

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1 not able to realize her objectives. And let me add
2 -- I'm not sure why -- because she has a Master's in
3 social work, which is a clinical degree.

4 Q. Are you aware that she's a LCSW non LICSW?

5 A. I have known that until recently.

6 Q. But you do know that now?

7 A. I know that today. What is the distinction?

8 Q. LCSW is a licensed clinical social worker
9 and LICSW is a licensed independent clinical social
10 worker?

11 A. Okay.

12 Q. Are you aware of any distinction in
13 Massachusetts in terms of the ability to practice
14 clinically?

15 A. No. Tell me right now because this sounds
16 critical to the case.

17 Q. You can't ask questions unfortunately. Did
18 you have any discussions with Susan Cooney about Mass
19 General Hospital?

20 A. Just in terms of her job.

21 Q. Did you have any discussions with Susan
22 Cooney about her interest in becoming a clinical
23 psychologist at Mass General Hospital or any other
24 hospital?

25 A. Not about becoming a clinical psychologist.

1 Q. Did you have any discussions that you recall
2 about her becoming a clinical psychologist in the
3 area of trauma?

4 A. Doing work in the area of trauma.

5 Q. Now, when you say you didn't have any
6 discussions, do you have a specific recollection that
7 that was never discussed or you can't recall
8 discussing those topics?

9 MS. GARCIA: Objection.

10 THE WITNESS: I can't recall with the strong
11 leaning to her not saying that.

12 MR. MORENBERG: Q. Can you recall the date
13 and time of these -- strike that.

14 Can you recall the approximate time frame of
15 these different discussions?

16 A. Within the period of her candidacy essays
17 and especially during her dissertation, which was
18 about trauma and secondary trauma to caregivers.

19 MR. MORENBERG: Let's mark this.

20 (Plaintiff's Exhibit 67, Personal
21 Statement, was marked for
22 identification.)

23 MR. MORENBERG: Q. Do you recall ever
24 seeing this document before today?

25 A. Yes.

1 MR. MORENBERG: Q. Do you want the question
2 read back to you?

3 A. Sure.

4 (The record was read back as follows:

5 Q. And that letter indicated that she
6 had an interest in clinical work in the area of
7 trauma after she finished her Ph.D., correct?")

8 MS. GARCIA: Objection, again.

9 MR. MORENBERG: Q. And you can answer the
10 question.

11 A. The letter doesn't say that.

12 Q. Regardless of what the letter does or does
13 not say -- in your opinion, did you have an
14 understanding, based on any communications with Susan
15 Cooney, that she had an interest in being a
16 psychologist or a counselor in the area of trauma?

17 A. I believed that she had an interest in doing
18 some further clinical work in that area and
19 potentially other things as well -- research,
20 writing.

21 Q. And did you have an understanding that she
22 wanted to do clinical work as a psychologist?

23 A. No, not specifically.

24 Q. Why did you think that Susan Cooney was
25 getting a Ph.D. from Saybrook?